

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	<u>I N D I C T M E N T</u>
	)	
Plaintiff,	)	
	)	CASE NO. _____
v.	)	Title 21, §846,
	)	United States Code,
RONALD DEDE,	)	Title 21, §§841(a)(1)
CRAIG DAWSON,	)	(b)(1)(A), (b)(1)(B),
OSWALDO SANCHEZ,	)	and (b)(1)(C),
LETRICIA EPPS,	)	United States Code,
HAKIM MALIK ALI,	)	Title 21, §843(b),
aka THE BUSINESS PARTNER,	)	United States Code,
RONALD LUCAS,	)	Title 18, §1956(a)(1)
RODNEY PETTIES,	)	(B)(i),
aka RED,	)	United States Code,
CHARLES PETTIES,	)	Title 18, §922(g)(1),
WALTER DENNIS, JR.,	)	United States Code,
aka BROTHER,	)	Title 18, §2,
DAVID MAYBERRY,	)	United States Code
aka SCOTT J. ROLLAND,	)	
PORTIA DENNIS,	)	
	)	
Defendants.	)	

COUNT 1

The Grand Jury charges:

Beginning at least as early as the Summer of 2002, and  
continuing through March 9, 2006, the exact date to the Grand

Jury unknown, in the Northern District of Ohio, Eastern Division and elsewhere, RONALD DEDE; CRAIG DAWSON; OSWALDO SANCHEZ; LETRICIA EPPS; HAKIM MALIK ALI, aka THE BUSINESS PARTNER; RONALD LUCAS; RODNEY PETTIES, aka RED; CHARLES PETTIES; WALTER DENNIS, JR., aka BROTHER; DAVID MAYBERRY, aka SCOTT J. ROLLAND; and PORTIA DENNIS, the defendants herein, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A),

It was an object of the conspiracy that RONALD DEDE, CRAIG DAWSON, OSWALDO SANCHEZ AND LETRICIA EPPS would arrange for the delivery of multiple kilograms of cocaine to the Canton, Ohio area.

It was further an object of the conspiracy that once the kilograms of cocaine had arrived in Canton, Ohio, RONALD DEDE would distribute them to HAKIM MALIK ALI, RONALD LUCAS, RODNEY PETTIES, and WALTER DENNIS JR., so that they could distribute cocaine to their customers to include CHARLES PETTIES, PORTIA DENNIS, and others.

#### OVERT ACTS

To effect the objects of the conspiracy, the defendants and

others performed overt acts.

1. On or about August, 2002, WALTER DENNIS, JR., arranged a meeting between RONALD DEDE and Tyree Wheeler where RONALD DEDE distributed 2 kilograms of cocaine to Tyree Wheeler for a total cost of \$50,000.

2. Subsequently, on or about September 2002, through March 2004, RONALD DEDE distributed multiple kilograms of cocaine to Tyree Wheeler.

3. On or about February 2004, Tyree Wheeler introduced Dante Jones to RONALD DEDE, so Dante Jones could receive multiple kilograms of cocaine from DEDE.

4. From on or about February 2004, up to and including December 2004, RONALD DEDE distributed multiple kilograms of cocaine to Dante Jones on a regular basis.

5. On or about December 14, 2004, RONALD DEDE flew from Los Angeles, California, to Cleveland, Ohio, via Southwest Airlines flight #0346, for the purpose of distributing multiple kilograms of cocaine.

6. On or about December 15, 2004, RONALD DEDE drove to 1415 Ohio Avenue, N.E., Canton, Ohio, where he distributed 12 kilograms of cocaine to Dante Jones.

7. On March 10, 2005, CHARLES PETTIES distributed approximately 3 ounces of cocaine to a cooperating witness.

8. On July 14, 2005, RONALD DEDE flew from Los Angeles, California, to the Pittsburgh International Airport, via

Southwest Airlines flight #1953, for the purpose of distributing multiple kilograms of cocaine, and was picked up by WALTER DENNIS, JR.

9. On July 16, 2005, RODNEY PETTIES, distributed approximately a 1/2 kilogram of cocaine to a cooperating witness.

10. On or about September 15, 2005, RONALD DEDE flew from Los Angeles, California, to the Pittsburgh International Airport, via Southwest Airlines flight #0082, for the purpose of distributing multiple kilograms of cocaine. He was picked up by WALTER DENNIS, JR., and traveled to 2611 Baldwin Avenue, N.E., Canton, Ohio, where he met LETRICIA EPPS.

11. On September 16, 2005, RONALD DEDE met with RODNEY PETTIES and then with HAKIM MALIK ALI.

12. On September 17, 2005, RODNEY PETTIES distributed a kilogram of cocaine to a cooperating witness.

13. On September 17, 2005, CHARLES PETTIES offered to sell a "murphy" (kilogram of cocaine) to the cooperating witness.

14. On September 27, 2005, the cooperating witness met RODNEY PETTIES and paid him \$6,000 for cocaine previously received.

15. On November 14, 2005, RONALD DEDE flew from Los Angeles California, to the Pittsburgh International Airport for the purpose of distributing multiple kilograms of cocaine. He was picked up by WALTER DENNIS, JR., and traveled to 2611 Baldwin Avenue, N.E., Canton, Ohio.

16. On November 15, 2005, LETRICIA EPPS flew from Phoenix, Arizona, to Cleveland, Ohio, via America West Airlines flight #0639, for the purpose of distributing multiple kilograms of cocaine.

17. On November 15, 2005, at approximately 11:20 a.m., RODNEY PETTIES spoke to RONALD DEDE on the telephone. DEDE said, "A lot of those stacks (bundles of drug money) is off." PETTIES asked, "What is the damage?" DEDE said, "Three so far and I'm not even finished."

18. On November 16, 2005, at approximately 5:36 p.m., CRAIG DAWSON met RONALD DEDE at 2611 Baldwin Avenue, N.E., Canton, Ohio.

19. On November 16, 2005, at approximately 5:48 p.m., RONALD LUCAS met RONALD DEDE at 2611 Baldwin Avenue, N.E., Canton, Ohio. LUCAS and an unidentified black male carried two plastic bags into the residence.

20. On November 17, 2005, OSWALDO SANCHEZ flew from Phoenix, Arizona, to Cleveland, Ohio, for the purpose of distributing multiple kilograms of cocaine. He was picked up by CRAIG DAWSON, who drove SANCHEZ to the Red Roof Inn at Everhard Road, N.W., Jackson Township, where SANCHEZ booked a room.

22. On November 19, 2005, RONALD DEDE met HAKIM MALIK ALI in the vicinity of 3051 Ellis Avenue, N.E., Canton, Ohio.

23. On November 19, 2005, at approximately 10:24 p.m., RONALD DEDE spoke to RODNEY PETTIES on the telephone. DEDE told PETTIES, "Hey, go ahead...do it in the morning ... you know, take care of the contractors" (sell the cocaine to his drug customers).

24. On November 20, 2005, LETRICIA EPPS was at 2611 Baldwin Avenue, N.E., Canton, Ohio.

25. On November 20, 2005, at approximately 2:05 p.m., RONALD DEDE spoke to RODNEY PETTIES on the telephone. DEDE asked how things were going. PETTIES said, "Got two down" (two kilograms of cocaine sold). DEDE advised he would have "Brother Man" (WALTER DENNIS, JR.) "swing by there" (pick up drug proceeds). PETTIES said, "It's going to be 23 (\$23,000) on each of them."

26. On November 21, 2005, at approximately 11:31 a.m., WALTER DENNIS, JR., spoke to RONALD DEDE on the telephone while DENNIS was at RODNEY PETTIES' residence. DENNIS, JR., told DEDE they were, "Taking care of this man, going through this shit" (counting drug money).

27. On November 21, 2005, at approximately 2:59 p.m., RODNEY PETTIES spoke to CHARLES PETTIES on the telephone. CHARLES told RODNEY, "I didn't call you back. I got it (drug money) at the house. It's at home in the safe."

28. On November 22, 2005, at approximately 8:06 p.m., RODNEY PETTIES spoke to RONALD DEDE on the telephone. RODNEY

PETTIES stated, "I got a few receipts (drug money) for you." DEDE asked, "... For one or two?" (kilograms of cocaine) PETTIES said, "For one." DEDE said he would tell "Brother Man" (WALTER DENNIS, JR.) and they could meet in the morning.

29. On November 26, 2005, at approximately 6:15 p.m., WALTER DENNIS, JR., spoke to RONALD PETTIES on the telephone. DENNIS, JR., said, "I'll see you in the morning." PETTIES responded, "I'll have you ready, too" (drug money ready for pickup).

30. On or about December 8, 2005, CHARLES PETTIES distributed approximately 2 ounces of cocaine to a cooperating witness.

31. On December 12, 2005, at approximately 11:04 a.m., RODNEY PETTIES spoke to WALTER DENNIS, JR., on the telephone. PETTIES said, "... I be ready for you in the morning." DENNIS JR., said, "... Cause I need to sit down and do that" (count the money). DENNIS, JR., asked, "How Many?" PETTIES replied, "Just one." (money from the sale of 1 kilogram of cocaine).

32. On December 29, 2005, at approximately 10:51 p.m., RODNEY PETTIES spoke to CHARLES PETTIES on the telephone. CHARLES told RODNEY, "... Call me when you get over there and I'll tell you how to get in my little thing (safe). ... I'm trying to go gather up some more now" (collect additional drug proceeds).

33. On December 29, 2005, at approximately 12:49 p.m., RODNEY PETTIES spoke to CHARLES PETTIES on the telephone. RODNEY asked, "What was all in there?" CHARLES replied, "Six-five" (\$6,500).

34. On December 31, 2005, at approximately 10:45 a.m., RONALD DEDE spoke to WALTER DENNIS, JR., on the telephone. DEDE told DENNIS, JR., "...We need to break that one down to make up for the one that we lost." DEDE also told DENNIS, JR., they should do the "four and a half piece of chicken" (sell a kilogram in 1/8th kilogram quantities). "...If they go 33 for each (\$3,300 for 1/8th kilogram) of them that will bring you to the address of 26 (\$26,000 for a kilogram) I think."

35. On December 31, 2005, at approximately 11:28 a.m., RODNEY PETTIES spoke to WALTER DENNIS, JR., on the telephone. DENNIS, JR., asked, "You got that one thing (drug money) for me?" PETTIES said "yes," and told DENNIS, JR., "Bring that tire, man."

36. On January 2, 2006, at approximately 11:47 a.m., RONALD DEDE spoke to PORTIA DENNIS on the telephone. DENNIS told DEDE, "Hopefully I get myself together so I can do some running for you."

37. On January 2, 2006, at approximately 1:41 p.m., RONALD DEDE spoke to HAKIM MALIK ALI on the telephone. DEDE asked how things were going and ALI said, "Yeah, somewhat a little, a little slower."



38. On January 5, 2006, at approximately 1:08 p.m., RODNEY PETTIES spoke to WALTER DENNIS, JR., on the telephone. PETTIES told DENNIS, JR., "I'm thinking about it, you know what I'm saying, getting it for 26" (\$26,000 a kilogram). DENNIS, JR., said, "...I was getting ready to ... , cause I'm going to tear it down" (breaking a kilogram into smaller quantities).

39. On January 6, 2006, at approximately 1:21 p.m., RONALD DEDE spoke to WALTER DENNIS, JR., on the telephone. DEDE told DENNIS, JR., "She (PORTIA DENNIS) should never give that guy that thing like that."

40. On January 11, 2006, at approximately 12:13 p.m., RONALD DEDE spoke to RONALD LUCAS on the telephone. DEDE told LUCAS he talked to "C" (CRAIG DAWSON) yesterday and "C" said, "As long as they get twenty doors (20 kilograms of cocaine)... the address (price) would be twenty" (\$20,000 per kilogram). LUCAS advised, "The one guy, he want ten" (ten kilograms).

41. On January 11, 2006, at approximately 1:55 p.m., RONALD DEDE spoke to WALTER DENNIS, JR., on the telephone about "Sis" (PORTIA DENNIS). DEDE asked, "Did you tell her I'm still going to work with her?"

42. On January 14, 2006, at approximately 7:22 p.m., RONALD DEDE spoke to HAKIM MALIK ALI on the telephone. DEDE asked, "How many invitations left for the party?" (how many kilograms does Ali have left). ALI said, "About, let's see, bout, bout, thirteen."

43. On January 17, 2006, at approximately 12:28 p.m., RONALD DEDE spoke to RONALD LUCAS on the telephone. LUCAS stated, "One still wants ten" (kilograms of cocaine). DEDE told LUCAS, " ... For ten doors it will be 21" (\$21,000 per kilogram). LUCAS asked the price on "fifteen doors."

44. On January 17, 2006, at approximately 12:38 p.m., RONALD DEDE spoke to PORTIA DENNIS on the telephone. DEDE stated he would be "home" soon and DENNIS responded she would be "ready to drive." They discussed a new hiding place in her house for drugs.

45. On January 17, 2006, at approximately 3:12 p.m., RONALD DEDE spoke to WALTER DENNIS, JR., on the telephone. They discussed the need for more envelopes (kilograms of cocaine). DEDE discussed DENNIS, JR., getting "five" (kilograms) and DENNIS, JR., responded he had received "six" (kilograms). DEDE said he would give PETTIES "eleven" like last time.

46. On January 20, 2006, at approximately 12:48 p.m., RONALD DEDE spoke to PORTIA DENNIS on the telephone. DEDE instructed DENNIS to wire transfer "nine" (\$900.00) in the name of Robert Lewis to a payment location in Pasadena, California.

47. On February 5, 2006, at approximately 1:18 p.m., RONALD DEDE spoke to HAKIM MALIK ALI on the telephone. ALI stated, "It's been a little slow." DEDE asked, "How many tires (kilograms) do you got left on the car, now?" ALI replied,

"About nine.....plus I got some other tires (kilograms of cocaine) out that the people got to pay me for."

48. On February 14, 2006, at approximately 1:22 p.m., RONALD DEDE spoke to RONALD LUCAS on the telephone. DEDE asked, "How things looking over there on B Street?" (2611 Baldwin Avenue, N.E., Canton, Ohio). LUCAS advised he had been there the previous Thursday to make sure the heat was on and had paid some bills.

49. On February 16, 2006, at approximately 2:50 p.m., RONALD DEDE spoke to WALTER DENNIS, JR., on the telephone. During the conversation, they discussed the number of kilograms distributed to HAKIM MALIK ALI on the previous trip. DEDE said, "See, he had 24 (kilograms of cocaine).

50. On February 18, 2006, at approximately 3:57 p.m., RONALD DEDE spoke to HAKIM MALIK ALI on the telephone. DEDE asked, "How things looking there?" ALI stated, "Yeah, its been slow for the pro." DEDE asked, "Okay, what you think, about another week?" ALI said, "Yeah."

51. On March 6, 2006, RONALD DEDE flew from Burbank, California, to the Pittsburgh International Airport, for the purpose of distributing multiple kilograms of cocaine. He was picked up by PORTIA DENNIS and, after dropping her off, traveled to 2611 Baldwin Avenue, N.E., Canton, Ohio.

52. On March 8, 2006, at approximately 12:56 p.m., RONALD DEDE spoke to RONALD LUCAS on the telephone. DEDE asked, "Hey buddy, so how many doors?" LUCAS said, "...I've seen the 10 guy already. He told the guys that have the receipts to be ready today...." LUCAS then said, "I got him, I'm going to try to go at least 15."

53. On March 8, 2006, at approximately 4:23 p.m., RONALD DEDE spoke to HAKIM MALIK ALI on the telephone. DEDE stated, "Leave everything there at the dog pound (ALI's mother's house where ALI keeps his dogs) and then I'll come get the dog food (drug money) in the morning, you know." ALI stated, "Okay."

54. On March 8, 2006, at approximately 5:40 p.m., RONALD DEDE drove to a coffee shop located in the vicinity of the bus station in Canton, Ohio, and picked up CRAIG DAWSON and LETRICIA EPPS and all three returned to 2611 Baldwin Avenue, N.E. Canton, Ohio.

55. On March 8, 2006, at approximately 8:46 p.m., RONALD DEDE spoke to RONALD LUCAS on the telephone. LUCAS said, "I'm going to have to get that number I was telling you about." DEDE said, "...you talking about that address 20....20 1/2, huh?" LUCAS said, "Yeah, a little lower than that." Late in the conversation LUCAS said, "...one guy give me the check, right, gave me the check today...."

56. On March 9, 2006, at approximately 9:38 a.m., RONALD DEDE met HAKIM MALIK ALI at 3051 Ellis, N.E., Canton, Ohio,

(ALI'S mother's house) where ALI removed a black duffle bag from his car and placed it in the trunk of the car driven by DEDE. DEDE was observed later that morning carrying the black duffle bag into 2611 Baldwin Avenue, N.E., Canton, Ohio.

57. On March 9, 2006, at approximately 2:20 p.m., LETRICIA EPPS, RONALD DEDE, and CRAIG DAWSON pushed a pick-up truck out of the garage at 2611 Baldwin Avenue, N.E., Canton, Ohio.

58. On March 9, 2006, at approximately 2:35 p.m., CRAIG DAWSON carried a laundry basket, which appeared full, from the residence at 2611 Baldwin Avenue, N.E., Canton, Ohio, into the garage. At the same time, LETRICIA EPPS carried the black duffle bag from the residence to the garage and closed the garage door.

59. On March 9, 2006, at approximately 2:56 p.m., DAVID MAYBERRY who was driving a 1987 Mazda, picked up OSWALDO SANCHEZ at the Red Roof Inn and drove to a Wal-Mart at Route 62 and Harmont Avenue, N.E., where they met CRAIG DAWSON.

60. On March 9, 2006, at approximately 3:09 p.m. LETRICIA EPPS opened the privacy fence at 2611 Baldwin Avenue, N.E., Canton, Ohio.

61. On March 9, 2006, at approximately 3:20 p.m., OSWALDO SANCHEZ, driving the 1987 Mazda, and CRAIG DAWSON, driving a black Taurus, drove to 2611 Baldwin Avenue, N.E., Canton, Ohio, where SANCHEZ backed the 1987 Mazda into the garage. DAWSON drove around the block and then pulled into the driveway at 2611 Baldwin Avenue, N.E., Canton, Ohio.

62. On March 9, 2006, at approximately 3:51 p.m., OSWALDO SANCHEZ drove the 1987 Mazda from the garage at 2611 Baldwin Avenue, N.E., Canton, Ohio, to the Wal-Mart at Route 62 and Harmont Avenue, where he picked up DAVID MAYBERRY.

63. On March 9, 2006, at approximately 4:37 p.m., DAVID MAYBERRY dropped OSWALDO SANCHEZ at the Red Roof Inn and drove the 1987 Mazda to the Quality Inn in Green, Ohio, where he drove the 1987 Mazda onto a U-Haul trailer.

64. On March 9, 2006, at approximately 5:52 p.m., DAVID MAYBERRY was stopped by the Ohio State Highway Patrol in possession of approximately \$950,000 in nineteen (19) individually heat sealed bags which were hidden in the trunk of the 1987 Mazda.

65. On March 9, 2006, RONALD DEDE, CRAIG DAWSON, LETRICIA EPPS, and OSWALDO SANCHEZ possessed 52 kilograms of cocaine, which were found in a cardboard box in the garage at 2611 Baldwin Avenue, N.E., Canton, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about August 2002, in the Northern District of Ohio, Eastern Division, RONALD DEDE and WALTER DENNIS, JR., did knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a

Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 3

The Grand Jury further charges:

On or about December 15, 2004, in the Northern District of Ohio, Eastern Division, RONALD DEDE did knowingly and intentionally distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 4

The Grand Jury further charges:

On or about March 10, 2005, in the Northern District of Ohio, Eastern Division, CHARLES PETTIES did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

The Grand Jury further charges:

On or about July 16, 2005, in the Northern District of Ohio, Eastern Division, RODNEY PETTIES, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

The Grand Jury further charges:

On or about September 17, 2005, in the Northern District of Ohio, Eastern Division, RODNEY PETTIES did knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 7

The Grand Jury further charges:

On or about December 8, 2005, in the Northern District of Ohio, Eastern Division, CHARLES PETTIES, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about January 27, 2006, in the Northern District of Ohio, Eastern Division and elsewhere, RONALD DEDE and PORTIA DENNIS, did knowingly conduct or attempt to conduct a financial transaction, that is the wiring of \$900 in United States currency from Canton, Ohio, to Pasadena, California, which in fact



involved the proceeds from a specified unlawful activity, to wit: conspiracy to possess with intent to distribute and distribute cocaine in violation of Title 21, Section 846, United States Code, knowing that the transaction involved the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole or part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

COUNT 9

The Grand Jury further charges:

On or about March 9, 2006, in the Northern District of Ohio, Eastern Division, RONALD DEDE, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: possession with intent to distribute cocaine in United States District Court, Los Angeles, California, on May 26, 1988, did knowingly possess in and affecting interstate commerce, firearms, to wit: a .25 caliber Beretta, Serial No. BU78943V; a Smith and Wesson, .38 caliber 6 shot revolver, Serial No. R8837; a Titan Tiger, .38 caliber revolver, Serial No. 806482; a Smith and Wesson, .357 revolver, Serial No. N573538; and a Smith and Wesson, .38 caliber revolver, Serial No. 579333, in violation of Title 18, United States Code, Section 922(g)(1).

Count 10

The Grand Jury further charges:

On or about March 9, 2006, in the Northern District of Ohio, Eastern Division, RONALD LUCAS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: aggravated robbery, Case Number 844317, Stark County Common Pleas Court on or about April 12, 1985, did knowingly possess in and affecting interstate commerce a firearm, to wit: a .38 caliber revolver, Serial No. PS01158 and a Mac 9 automatic pistol, Serial No. 017853, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 11

The Grand Jury further charges:

On or about March 9, 2006, in the Northern District of Ohio, Eastern Division, HAKIM MALIK ALI having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: carrying a concealed weapon, Case Number 89 CR 9269 on or about April 27, 1990, did knowingly possess in and affecting interstate commerce firearms, to wit: a Smith and Wesson, Model 1645, semi-automatic handgun, Serial No. TAL 4466; a Smith and Wesson, .44 caliber magnum revolver, Serial No. MCR0124; a Desert Eagle, .50 caliber semi-automatic handgun, Serial No. 31201601 and a .32 caliber revolver, Serial No. 176002, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 12

The Grand Jury further charges:

On or about March 9, 2006, in the Northern District of Ohio, Eastern Division, RONALD DEDE, CRAIG DAWSON, LETRICIA EPPS, and OSWALDO SANCHEZ did knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNTS 13 TO 42

The Grand Jury further charges:

On or about the dates listed below, in the Northern District of Ohio, Eastern Division and elsewhere, the defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846.

<u>Count</u>	<u>Defendant</u>	<u>Date</u>
13	RODNEY PETTIES RONALD DEDE	November 15, 2005
14	RONALD DEDE RODNEY PETTIES	November 19, 2005
15	RONALD DEDE RODNEY PETTIES	November 20, 2005
16	WALTER DENNIS, JR. RONALD DEDE	November 21, 2005

<u>Count</u>	<u>Defendant</u>	<u>Date</u>
17	RODNEY PETTIES CHARLES PETTIES	November 21, 2005
18	RODNEY PETTIES RONALD DEDE	November 22, 2005
19	WALTER DENNIS, JR. RODNEY PETTIES	November 26, 2005
20	RODNEY PETTIES WALTER DENNIS, JR.	December 12, 2005
21	RODNEY PETTIES CHARLES PETTIES	December 29, 2005
22	RODNEY PETTIES CHARLES PETTIES	December 29, 2005
23	RONALD DEDE WALTER DENNIS, JR.	December 31, 2005
24	RODNEY PETTIES WALTER DENNIS, JR.	December 31, 2005
25	RONALD DEDE PORTIA DENNIS	January 2, 2006
26	RONALD DEDE HAKIM MALIK ALI	January 2, 2006
27	RODNEY PETTIES WALTER DENNIS, JR.	January 5, 2006
28	RONALD DEDE WALTER DENNIS, JR.	January 6, 2006
29	RONALD DEDE RONALD LUCAS	January 11, 2006
30	RONALD DEDE WALTER DENNIS, JR.	January 11, 2006
31	RONALD DEDE HAKIM MALIK ALI	January 14, 2006
32	RONALD DEDE RONALD LUCAS	January 17, 2006

<u>Count</u>	<u>Defendant</u>	<u>Date</u>
33	RONALD DEDE PORTIA DENNIS	January 17, 2006
34	RONALD DEDE WALTER DENNIS, JR.	January 17, 2006
35	RONALD DEDE PORTIA DENNIS	January 20, 2006
36	RONALD DEDE HAKIM MALIK ALI	February 5, 2006
37	RONALD DEDE RONALD LUCAS	February 14, 2006
38	RONALD DEDE WALTER DENNIS, JR.	February 14, 2006
39	RONALD DEDE HAKIM MALIK ALI	February 18, 2006
40	RONALD DEDE RONALD LUCAS	March 8, 2006
41	RONALD DEDE HAKIM MALIK ALI	March 8, 2006
42	RONALD DEDE RONALD LUCAS	March 8, 2006

All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

#### FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, the allegations of Counts 1 through 12 are incorporated herein by reference. As a result of the foregoing offenses, RONALD DEDE, CRAIG DAWSON, OSWALDO SANCHEZ, LETRICIA EPPS,

HAKIM MALIK ALI, aka THE BUSINESS PARTNER, RONALD LUCAS, RODNEY PETTIES, aka RED, CHARLES PETTIES, WALTER DENNIS, JR., aka BROTHER, DAVID MAYBERRY, aka SCOTT J. ROLLAND, and PORTIA DENNIS, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; including, but not limited to, the following:

- a. \$956,460.00 in U.S. Currency seized from a 1987 Mazda, on March 9, 2006;
- b. \$19,227.00 in U.S. Currency seized from 1620 Superior, Canton, Ohio, on March 9, 2006;
- c. \$78,555.00 in U.S. Currency seized from 6967 Deer Trail, Canton, Ohio, on March 9, 2006;
- d. \$20,776.00 in U.S. Currency seized from 2611 Baldwin Avenue, N.E., Canton, Ohio, on March 9, 2006;
- e. \$3,880.00 in U.S. Currency seized from 1708 Grace Avenue, Canton, Ohio, on March 9, 2006;
- f. \$1,540.00 in U.S. Currency seized from RONALD DEDE, on March 9, 2006;
- g. \$27,920.00 in U.S. Currency seized from 5823 Glyn, North Canton, Ohio, on March 9, 2006.

Substitute Assets: In the event that any property subject to forfeiture pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants:

1. Cannot be located upon exercise of due diligence;
2. Has been transferred or sold to, or deposited with a third party;

3. Has been placed beyond the jurisdiction of the Court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, up to an amount equivalent to the value of the property forfeitable under Section 853.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

United States v. Ronald Dede, et al.

A TRUE BILL.

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FOREPERSON

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GREGORY A. WHITE  
United States Attorney